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UNITED OF OMAHA LIFE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GRACE JEFFERSON,
Plaintiffs,

VS.

UNITED OF OMAHA LIFE INSURANCE
COMPANY, and DOES 1 through 10,

Defendants.

) Case No. 3:15-CV-03577 HSG (SK)
) Honorable Haywood S. Gilliam, Jr.

STIPULATION RE SETTLEMENT AND [PROPOSED] ORDER

Complaint Filed: August 4, 2015

Under the power of attorney granted to her from Plaintiff Grace Jefferson, Jasmine Chalfant, by and through her counsel, DL Law Group; and Defendant United of Omaha Life Insurance Company, by and through its counsel, Hinshaw & Culbertson LLP (collectively, “the parties”), have met and conferred and hereby stipulate as follows:

1. The parties have agreed in principal to a global settlement of this action.
2. Per the Court’s Scheduling Order [Docket 62], Plaintiff’s deadline to file her Motion to Supplement the Administrative Record is Monday, October 24, 2016.
3. The parties agree all deadlines in this action shall be taken off calendar, pending the anticipated dismissal of this action, which the parties anticipate will occur within the next 30 days.
4. The parties agree that, in the event the settlement somehow fails, Plaintiff will not be prejudiced with respect to the filing of a Motion to Supplement the Administrative Record. Should that occur, the parties will meet and confer regarding a new briefing schedule and will submit a proposed stipulated schedule to the Court for approval.

THE PARTIES HEREBY STIPULATE AND AGREE TO THE ABOVE

Dated: October 24, 2016

DL LAW GROUP

By: /s/ David M. Lilienstein
 DAVID M. LILIENSTEIN
 JESSICA M. CHO
 Attorneys for Plaintiff
 GRACE JEFFERSON

Dated: October 24, 2016

HINSHAW & CULBERTSON LLP

By: /s/ Peter J. Felsenfeld
 J. RUSSELL STEDMAN
 SANDRA I. WEISHART
 PETER J. FELSENFELD
 Attorneys for Defendant
 UNITED OF OMAHA LIFE INSURANCE
 COMPANY

FILER'S ATTESTATION

I, David M. Lilienstein, am the ECF user whose identification and password are being used to file this Stipulation Re Settlement and [Proposed] Order. In compliance with Local Rule 5-1(i)(3), I hereby attest that all party signatories hereto concur in this filing.

/s/ David M. Lilienstein
DAVID M. LILIENSTEIN

IT IS SO ORDERED.

Dated: _____

HON. HAYWOOD S. GILLIAM, JR.
UNITED STATE DISTRICT JUDGE